

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

KELLY THOMAS,

Plaintiff,

v.

ZENITH SOLAR LLC

Defendants.

)
)
) Case No.:
)
) 7:22-cv-00047
)
)
)
)

DECLARATION OF JACOB U. GINSBURG

The Affiant, being duly sworn and upon oath, hereby states the following:

1. I am one of Plaintiff's attorneys in this matter and was retained to represent Plaintiff in a claim against Defendant, pursuant to the Telephone Consumer Protection Act.

2. Defendant, Zenith Solar LLC., was served via personal service on March 8, 2022.
See Docket Entry 4.

3. Defendant's answer would have been due April 07, 2022.

4. Neither Defendant nor an attorney for Defendant has reached out to request an extension or to otherwise discuss the case.

5. Despite proper service, as of this date, no answer to Plaintiff's complaint has been filed.

6. Defendant is not a minor, incompetent person, or in the military or foreign service.

FURTHER AFFIANT SAYETH NAUGHT.

SO CERTIFIED:

/s/ Jacob U. Ginsburg

